Case 1:12-cv-05966-CM-RLE Document 201 Filed 06/30/14 Page 1 of 1

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June 30, 2014

BY ECF

Honorable Ronald L. Ellis United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Veleron Holding, B.V. v. Morgan Stanley, et al., 12-cv-5966 (S.D.N.Y.)

Dear Judge Ellis:

We write on behalf of plaintiff Veleron Holding, B.V. ("Veleron") regarding the letter submitted by the Morgan Stanley defendants ("Morgan Stanley") on June 26, 2014, which seeks to compel Veleron to produce unspecified documents that it has withheld on the basis of privilege (the "June 26 Letter").

Despite Veleron's explicit invitation to meet and confer, as set forth in a letter it sent over a month ago, Morgan Stanley, prior to bringing its motion, did not attempt to meet and confer with Veleron to resolve or otherwise narrow the issues raised in its June 26 Letter. Accordingly, Veleron respectfully requests that you deny Morgan Stanley's motion until such time as the parties have had an opportunity to meet and confer in good faith as is required.

In the event that you would prefer the parties to forego the meet and confer process, Veleron will file a substantive response to the June 26 Letter on or before Thursday, July 3, 2014.

Respectfully,

Ronald R. Rossi

cc: All Counsel (by ECF)